

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No. 23-cv-21377-DPG

**DEFENDANT’S AMENDED NOTICE OF COMPLIANCE REGARDING
AUGUST 17, 2023 DISCOVERY HEARING**

Defendant, Michael D. Cohen, by and through undersigned counsel and pursuant to this Court’s Order Setting Discovery Procedures, files this Amended Notice of Compliance Regarding August 17, 2023 Discovery Hearing and identifies the following issues to be heard during the discovery hearing scheduled for Thursday, August 17, 2023, at 9:30am in person at James Lawrence King Federal Justice Building, 99 N.E. Fourth Street, Tenth Floor, Courtroom Five, Miami, Florida 33132:

I. Defendant’s Objections to Plaintiff’s First Request for Production.

Defendant seeks an order overruling Plaintiff’s objections to Defendant’s First Request for Production and compelling Plaintiff to produce responsive documents. Plaintiff has raised various objections to thirty-four requests, which Defendant seeks to have overruled and to compel production of responsive documents. (Requests Nos. 2, 3, 4, 5, 6, 18, 19, 26, 27, 34, 35, 37, 38, 39, 40, 44, 45, 46, 48, 49, 50, 51, 52, 53, 54, 55, 59, 60, 65, 66, 67, 68, 69, and 61). Plaintiff has raised no objection to eleven requests and indicated that documents “will be produced,” for which Defendant seeks to compel production of responsive documents by a date certain (Requests Nos. 7, 11, 12, 14, 15, 36, 41, 43, 58, 62, and 63).

II. Permissible Scope of Topics for Plaintiff's Deposition.

Plaintiff's deposition has been noticed for September 6, 2023. The parties disagree about the permissible scope of questioning at the deposition. Plaintiff's counsel has indicated that he will object to questioning on at least the following six topics: (i) the events surrounding January 6, 2021; (ii) the New York State criminal charges against Plaintiff related to alleged payments made to Stephanie Clifford; (iii) allegations that David Pecker was involved in any alleged transactions involving Stephanie Clifford; (iv) any alleged relationship between Plaintiff and Karen McDougal; (v) Plaintiff's handling of classified documents after his term as President of the United States; and (vi) any issues related to any criminal or civil cases filed or pending against Plaintiff, the Trump Organization, or any related entities. Defendant seeks an order or instruction from the Court on the permissibility of these topics of questioning at Plaintiff's deposition.

CERTIFICATE OF GOOD FAITH CONFERRAL

Pursuant to S.D. Fla. L. R. 7.1(a)(3), undersigned counsel for Defendant certifies that he has conferred with Plaintiff's counsel in a good faith effort to resolve the issues raised herein, but have been unable to resolve the disputes.

Respectfully submitted,

By: /s/ Max A. Eichenblatt
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Counsel for Defendant Michael D. Cohen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 9, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Max A. Eichenblatt
Max A. Eichenblatt